

January 6, 2020

Mr. Michael Rosauer
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #7 for the Sanger Substation Expansion Project

Dear Mr. Rosauer,

Construction for the Sanger Substation Expansion Project began on November 5, 2018. This report provides a summary of the compliance monitoring activities that occurred during the period from **May 1 to 31, 2019**, for the Sanger Substation Expansion Project in Fresno County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Pacific Gas & Electric (PG&E) and their contractors comply with the requirements of the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the Sanger Substation Expansion Project, as adopted by the California Public Utilities Commission (CPUC) on July 13, 2017.

Table 1 summarizes CPUC-approved Notice to Proceed (NTP) activities to-date for the Sanger Substation Expansion Project, based on activities proposed in PG&E's Notice to Proceed Requests (NTPRs).

Table 1 CPUC-approved NTP Activities for the Sanger Substation Expansion Project

| NTP# | Final NTPR Submittal Date | CPUC NTP Issuance Date | Description of Approved Activities |
|--------|---------------------------|------------------------|--|
| NTP #1 | 11/1/2018 | 11/2/2018 | Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of access driveways, fencing, foundations, substation equipment, and a microwave tower; and installation of two antenna dishes at an off-site location (Fence Meadow Repeater Station). |

Table 2 summarizes all CPUC-approved Minor Project Refinements (MPRs) to-date for the Sanger Substation Expansion Project.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

| MPR# | Final MPR Submittal Date | CPUC MPR Approval Date | Description of Minor Project Refinement |
|----------|--------------------------|------------------------|--|
| MPR #001 | 5/24/2018 | 6/12/2018 | Minor modifications to the placement and types of poles in the "power line reconfiguration" project component to suit engineering refinements that were made after Final IS/MND approval. The modifications would occur approximately 2,100 feet west; 750 feet east; and 165 feet south of the existing Sanger Substation footprint. In total, there would be modifications to seven poles. |

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

| MPR# | Final MPR Submittal Date | CPUC MPR Approval Date | Description of Minor Project Refinement |
|----------|--------------------------|------------------------|---|
| MPR #002 | 7/17/2018 | 7/20/2018 | An additional temporary laydown yard/staging area (approximately 974 feet by 112 feet) located north of the retention basin, running north between the western boundary of the substation expansion area and the western boundary of the existing Sanger Substation footprint. This area is owned in fee title by PG&E. |
| MPR #003 | 11/13/2018 | 11/14/2018 | Use of an existing water well approximately 100 feet north of approved NTP #1 work areas, within the same parcel as the Sanger Substation footprint. PG&E has obtained permission from the landowner to use this well for a specified timeframe. PG&E will access the well pump by foot, and will obtain water from this well for dust control purposes. MPR #3 adds no additional ground disturbance to the existing disturbance footprint, other than impacts from light foot traffic and temporary ground placement of a water hose. |

Project Compliance Incidents

Onsite compliance monitoring by the Ecology and Environment, Inc., member of WSP (hereafter referred to as E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Ben Arax visited the Sanger Substation construction site on **May 9 and 23, 2019**. CPUC Compliance Monitoring Reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visits. These reports are attached below (Attachment 1).

Overall, the Sanger Substation Expansion Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program’s (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and PG&E has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/E & E and PG&E, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, PG&E’s weekly compliance status reports provided a compliance summary, a description of construction activities that occurred each week, a summary of compliance with MMCRP conditions (MMs/APMs) for biological, cultural and paleontological resources; the Storm Water Pollution Prevention Plan (SWPPP); noise and traffic control; onsite hazards; and the Worker Environmental Awareness Program (WEAP), as well as any non-compliance issues and resolutions, and public complaints and notifications.

Compliance Incidents and Minor Compliance Observations

During the May 2019 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

Noise Compliance

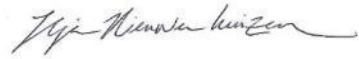
During the May 2019 reporting period, there were no exceedances of the stipulated noise levels.

Public Concerns

No public concerns were reported during May 2019.

Mr. Michael Rosauer
January 6, 2020
Page 3

Sincerely,

A handwritten signature in cursive script, appearing to read "Ilja Nieuwenhuizen".

Ilja Nieuwenhuizen
Project Manager, Ecology and Environment, Inc.

cc:

Michael Calvillo, PG&E
Carie Montero, Parsons
Lincoln Allen, SWCA

ATTACHMENT 1

CPUC COMPLIANCE MONITORING REPORTS

MAY 9 AND 23, 2019



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

| | | | |
|---|---|------------------------|---|
| Project Proponent | Pacific Gas & Electric (PG&E) | Report No. | CM-CPUCBA-050919 |
| Lead Agency | California Public Utilities Commission (CPUC) | Date (mm/dd/yy) | 05/09/19 |
| CPUC Project Manager | Michael Rosauer | Monitor(s) | Ben Arax |
| CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager | Ilja Nieuwenhuizen | AM/PM Weather | 68° F, partly cloudy, wind 5 miles per hour (mph) |
| CPUC (E & E) Monitoring Supervisor | Fernando Guzman | Start/End Time | 10:09 AM – 10:53 AM |
| Project Notices to Proceed NTP(s) | NTP #2 | | |

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

| Worker Environmental Awareness Program (WEAP) Training | Yes | No | N/A |
|---|-----|----|-----|
| Is the WEAP training in place and does it appear to have been completed by all onsite personnel (e.g., construction workers, managers, inspectors, monitors)? | X | | |
| Erosion and Dust Control (Air and Water Quality) | Yes | No | N/A |
| Have temporary erosion and sediment control measures (best management practices [BMPs]) been installed in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)? | X | | |
| Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events? | X | | |
| Are measures in place to avoid/minimize mud tracking onto public roadways? | X | | |
| Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)? | X | | |
| Are work areas being effectively watered prior to excavation or grading? | X | | |
| Are measures in place to stabilize soils and effectively suppress fugitive dust? | X | | |
| Equipment | Yes | No | N/A |
| Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road? | X | | |
| Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris? | X | | |
| Are observed vehicles/equipment turned off when not in use? | X | | |

| Work Areas | Yes | No | N/A |
|---|-----|----|-----|
| Is vegetation disturbance within work areas minimized? | X | | |
| Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate? | X | | |
| Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads? | X | | |
| Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide? | X | | |
| Biology | Yes | No | N/A |
| Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate? | X | | |
| Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)? | X | | |
| Is project complying with biological monitoring requirements (e.g., if required, are monitors present)? | X | | |
| If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)? | X | | |
| Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below. | | X | |
| Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below. | | X | |
| Did you observe any threatened or endangered species? If yes, describe below. | | X | |
| Have there been any work stoppages for biological resources? If yes, describe below. | | X | |
| Cultural and Paleontological Resources | Yes | No | N/A |
| Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g., cultural sites) clearly marked and being maintained? | X | | |
| Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)? | X | | |
| Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)? | X | | |
| Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below. | | X | |
| Hazardous Materials | Yes | No | N/A |
| Are hazardous materials that are stored or used onsite properly managed? | X | | |
| Are procedures in place to prevent spills and accidental releases? | X | | |

| | | | |
|--|-----|----|-----|
| Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite? | X | | |
| Are contaminated soils properly managed for onsite storage or off-site disposal? | X | | |
| Work Hours and Noise | Yes | No | N/A |
| Are required night lighting reduction measures in place? | X | | |
| Is construction occurring within approved work hours? | X | | |
| Are required noise control measures in place? | X | | |

AREAS MONITORED

Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

10:09 AM- I arrived onsite.

10:15 AM- I met with Jeff Clarkson (PG&E Senior Civil Inspector). Mr. Clarkson explained that AJ Excavation was pouring foundations inside of the expansion footprint (Photos 2 and 7), as well as a Kroeker crew drilling inside pole boxes (Photos 1 and 3). He also explained that the Killdeer (*Charadrius vociferous*) inside the retention basin were observed by Ms. Castañon on the existing substation structure (Photo 9); however a buffer could not be maintained due to electrical hazard. Therefore, the agreed resolution was to add signage to prevent crew members/unauthorized personnel from entering the buffer zone.

9:34 AM- I began site inspection. I observed crews pouring concrete for pole boxes (Photos 4 and 5), digging trenches (Photo 1), moving soil (Photo 2) and utility relocation (Photo 11). Materials were observed stored neatly and away from construction activities (Photo 6). The silt fence around the expansion footprint was somewhat sagging, but it was apparent that it was being maintained (APM GEO-2/WQ-1), be it with tape, new silt fence, or otherwise (Photo 8). A newly paved road for the truck egress point was observed, immediately after trackout rock and rumble plates (Photo 7). During the inspection, storm reports were observed to not be up-to-date. However, Jeff Clarkson notified the corresponding SWPPP inspector, who confirmed she would bring the reports on Friday, 05/24/19.

10:00 AM- I completed the site inspection.

10:05 AM- I left the project site.

MITIGATION MEASURES VERIFIED

MM BIO-1, APM AIR-1, APM HAZ-3, MM HAZ-2, APM GHG-1, MM HAZ-1

See additional applicant proposed measures (APMs) and mitigation measures (MMs) listed in the Description of Observed Activities section.

RECOMMENDED FOLLOW-UP

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

Level 0 Acceptable. (no compliance incidents)

Level 1: Minor Problem. An event or observation that slightly deviates from project requirements, but does

not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.

Level 2: Compliance Deviation. An event or observation that deviates from project requirements and puts a resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form.

Level 3: Non-Compliance. An event or observation that violates project requirements and affects a resource. Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) APMs or MMs, permit conditions, or approval requirements (e.g., minor project changes, NTP), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.

Compliance Incidents reported by PG&E’s Compliance Team

PG&E’s Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.

Description: *(include PG&E’s report number)*

New Sensitive Resources

New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

A Killdeer has built a nest on the outside of the northern fence of the substation expansion footprint. A buffer was placed around the resource, with only 13 feet of it entering the expansion footprint.



| Date | Level | Compliance Incident and Resolution | Relevant Mitigation Measure | Corresponding Level 1, 2, or 3 Report # |
|------|-------|------------------------------------|-----------------------------|---|
| | | | | |




PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:



Several minor oil spills in the parking area of the expansion footprint were observed on 05/09/19. Chennie Castañon was notified of the incident. She stated that she would notify Jeff Clarkson and work together to resolve the issue. No oil spills were observed on 05/23/19. The incident was resolved.

REPRESENTATIVE SITE PHOTOGRAPHS

| Date | Location | Photo | Description |
|----------|---------------------|--|--|
| 05/23/19 | Expansion footprint |  | Photo 1- Excavator crawler digging a trench for utility lines. Photo facing southwest. |
| 05/23/19 | Expansion footprint |  | Photo 2- Mini compact loader moving soil. Photo facing southwest. |
| 05/23/19 | Expansion footprint |  | Photo 3- AJ crew pouring concrete for pole boxes. Photo facing north. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---------------------------------|---------------------|--|--|
| Date | Location | Photo | Description |
| 05/23/19 | Expansion footprint |  | Photo 4-Completed pole boxes. Photo facing northwest. |
| 05/23/19 | Expansion footprint |  | Photo 5- AJ crew working on freshly poured pole boxes. Photo facing southwest. |
| 05/23/19 | Expansion footprint |  | Photo 6- Materials kept away from work area. Photo facing northeast. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---------------------------------|---------------------|--|---|
| Date | Location | Photo | Description |
| 05/23/19 | Expansion footprint |  | Photo 7- Newly paved road for egress point. Photo facing north. |
| 05/23/19 | Expansion footprint |  | Photo 8- Silt fence weathered but maintained. Photo facing north. |
| 05/23/19 | Existing substation |  | Photo 9- Kestrel nest located in existing substation; entrance is on top of the second beam. Photo facing east. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|--|---------------------|---|---|
| Date | Location | Photo | Description |
| 05/23/19 | Existing substation |  | Photo 10- KILL 04 buffer still up; nest still active. Photo facing southwest. |
| 05/23/19 | Existing substation |  | Photo 11- AJ crew performing utility relocation. Photo facing east. |

| | |
|----------------------|-------------------------------------|
| Completed by: | Ben Arax |
| Firm: | Soar Environmental Consulting, Inc. |
| Date: | 05/23/19 |
| Reviewed by: | Patrick Sauls |
| Firm: | Soar Environmental Consulting, Inc. |
| Date: | 05/23/19 |